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24 **UNITED STATES DISTRICT COURT**
25 **DISTRICT OF NEVADA**

26 NAVAJO HEALTH FOUNDATION – SAGE
27 MEMORIAL HOSPITAL, INC. (doing
28 business as “Sage Memorial Hospital”); an
Arizona non-profit corporation,

Plaintiff,

vs.

RAZAGHI DEVELOPMENT COMPANY,
LLC; a Nevada limited liability company
(doing business as “Razaghi Healthcare”),
AHMAD R. RAZAGHI; individually, TAUSIF
HASAN; individually, DOES 1-10;

Defendants.

Case No. 2:19-cv-0329-GMN-EJY

**JOINT STIPULATION TO EXTEND
PLAINTIFF’S TIME TO RESPOND TO
DEFENDANTS’ MOTION TO STAY
DISCOVERY AND FOR RULE 11
SANCTIONS**

(THIRD REQUEST)

Pursuant to Federal Rule of Civil Procedure (“FRCP”) 6 and the Court’s Local Rule of Civil Practice 7-1, the parties hereby stipulate, subject to the Court’s approval, to permit Plaintiff additional time, to and until April 15, 2022, to respond to Defendant’s motion to stay discovery (ECF No. 170) and to their FRCP 11 sanctions motion (ECF No. 174). Presently, Plaintiff’s responses to the referenced motions are due today, April 8, 2022. This is the parties’ third request for extension of time related to the above-referenced motions.

In support of this Stipulation, the parties agree to the following:

1. The parties have communicated regarding the pending motions and agree that good cause exists to support the extension. As communicated by Plaintiff’s counsel to counsel for Defendants, Plaintiff has substantially completed the response to the Rule 11 motion but additional time is needed to coordinate its proper review and filing. This will be difficult under the current deadline because Kathleen Bliss, Esq. is out of town on a family matter and Paul S. Padda, Esq. has been busy the last three days preparing for a sentencing hearing in a federal criminal matter while also attending a deposition that required his time and attention.

2. Counsel for the respective parties have communicated regarding this Stipulation and agree that an extension of time to permit the following is appropriate:

- a. Plaintiff shall respond to the motion to stay discovery on or before April 15, 2022.
- b. Plaintiff shall respond to the motion for FRCP 11 sanctions on or before April 15, 2022.

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The parties respectfully request the Court approve this Stipulation.

/s/ Kris Leonhardt

/s/ Paul S. Padda

Pavneet S. Uppal, Esq.
Kris Leonhardt, Esq.
Jeffrey D. Winchester, Esq
Counsel for all named Defendants

Kathleen Bliss, Esq.
Paul S. Padda, Esq.
David Stander, Esq.
Douglass A. Mitchell, Esq.
*Counsel for Plaintiff,
Counterdefendant and Third-Party
Defendants*

Dated: April 8, 2022

Dated: April 8, 2022

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: April 8th, 2022